

EXHIBIT 2

Andrew N. Faes

From: William Gage <William.Gage@butlersnow.com>
Sent: Tuesday, December 17, 2013 1:32 PM
To: 'Bryan Aylstock'; Tom P. Cartmell; Renee Baggett; Daniel Thornburgh (DThornburgh@awkolaw.com); Betsy Williams (BWilliams@awkolaw.com); Andrew N. Faes; Ben Anderson
Cc: Christy Jones; Donna Jacobs; Ben Watson; 'David Thomas'
Subject: Pelvic Mesh Custodial Production Summaries
Attachments: Pelvic Mesh Custodial Production Summaries.pdf

Bryan,

This is in response to Andrew's December 4, 2013, letter regarding custodial files for 16 custodians. It is also in response to your December 2, 2013, e-mail to Ben Watson regarding depositions for two of the custodians identified in Andrew's letter.

For many of the custodians at issue, the questions raised are addressed by charts we previously sent to plaintiffs. I am attaching them for your reference and in response to your inquiry, with respect to the ones not covered, I have asked for an additional chart to be prepared in the same format, which I am also attaching. Together, I believe these charts address all of Andrew's inquiries.

We note that David Stoloff was last collected in January 2013, as he is not a custodian who was designated to be supplemented on a six month cycle pursuant to the list we previously provided to plaintiffs. Please let us know if plaintiffs are now requesting a supplementation of his file. If so, I understand that we will need approximately 45 days to collect and supplement.

As to Bryan's request for depositions of Barbara Schuldt and Christopher Walker, we note that neither of these individuals were on plaintiffs' comprehensive list of depositions circulated earlier this Fall. While I understand that Walther's pelvic mesh documents will be produced later this months, we have only recently obtained Barbara Schuldt's authorization and are in the process of scheduling her collection. It is unlikely that her documents will be produced before the end of January, although I have asked that best efforts be made to collect and produce her documents as quickly as possible, taking into account other production

demands. We suggest that both these depositions be put off until after the Lewis trial and we will work with you to schedule them in due course.

Thanks, William

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IN RE: PELVIC MESH LITIGATION

**CUSTODIANS IDENTIFIED IN DECEMBER 04
CORRESPONDENCE FROM A. FAES^{*}**

Custodian	Custodial File Updated as of	Status of Production¹
Divilio, Tom	separation	complete ²
Harm, Michael	separation	to be completed as of 01/31/14
Librojo, Rey	N/A	to be completed as of 01/31/14
Linsky, Cary	separation	complete ²
Riedley, Charles	w/n last 6 mos.	to be completed as of 12/31/13
Schuldt, Barbara	scheduled	to be completed as of 01/31/14
Selley, Nicole	separation	to be completed as of 12/31/13
Stoloff, David	Jan. 2013	to be completed as of 12/31/13
Thomas, Tiffany	w/n last 6 mos.	to be completed as of 12/31/13
Vasquez, Domingo	w/n last 6 mos.	to be completed as of 12/31/13
Walther, Christopher	w/n last 6 mos.	to be completed as of 12/31/13

^{*} Not already identified on the September Depo, Post-September Depo or Other Custodian charts.

¹ "Complete" means that Ethicon is presently not aware of additional responsive documents to be produced. However, as a result of resolution of technical exceptions, possible privilege downgrades, additional filter terms that may be agreed to, and searches described in the hernia mesh stipulation, additional documents may still be produced for these custodians as they become identified.

² No documents were identified.

**OTHER CUSTODIANS IDENTIFIED IN AUGUST 30
CORRESPONDENCE FROM B. AYLSTOCK**

Custodian	Custodial File Updated as of	Status of Production¹
Barendse, Stevan	separation	complete
Bennett, Jeffrey	w/n last 6 mos.	complete
Busch, Sean	separation	complete
Butler, General	w/n last 6 mos.	to be completed as of 09/30
Chaves, Melissa	transfer	complete
Clay, John	separation	complete ²
Courts, Paul	w/n last 6 mos.	complete
Crawford, Richard	transfer	complete
Cronan, Juli	w/n last 6 mos.	to be completed by 09/16
D'Aversa, Margaret	Jun. 2011	complete
David, Elizabeth	w/n last 6 mos.	complete
Day, Diana	separation	complete
Doane, Peter	w/n last 6 mos.	to be completed by 09/30
Dodd, Sheri	separation	complete
Duncan, Katherine	separation	complete
Dunning, R Scott	w/n last 6 mos.	complete
Elbert, Katrin	w/n last 6 mos.	to be completed by 09/30
Esau, Christen	separation	complete
Fights, Mark	separation	complete
Gallagher, Matthew	separation	complete
Globerman, Eric	separation	complete
Godwin, Amy	transfer	complete ²
Hamby, Jessica	separation	complete
Heckman, Brian	separation	complete
Heitzmann, Barbara	N/A	newly-identified by plaintiffs

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² No documents were identified.

IN RE: PELVIC MESH LITIGATION

Custodian	Custodial File Updated as of	Status of Production ¹
Hutchinson, Richard	Nov. 2011	complete
Johnson, Kevin	separation	complete
Johnson, Matthew	Jul. 2012	complete
Kajy, Mark	w/n last 6 mos.	complete
Kelly, Susan	separation	complete
Kerl, Brad	w/n last 6 mos.	complete
Kisner, Heather	separation	complete
Landgrebe, Susanne	w/n last 6 mos.	to be completed by 09/16
Langen, Brian	transfer	complete
LeClair, Nancy	separation	to be completed by 09/16
Lisa, Bryan	transfer	complete
Martin, Samantha	separation	complete
Meyer, Stacy	N/A	newly-identified by plaintiffs
Miller, Douglas	separation	complete
Mohler, Troy	separation	complete
Mooney, Mark	Feb. 2013	to be completed by 09/30
Munchel, Kendra	separation	complete ²
Oldelehr, Marcus	separation	complete
Phillips, James	N/A	newly-identified by plaintiffs
Pompilio, Sandra	separation	complete
Prefer, Scott	Apr. 2012	complete
Remoll, Adam	separation	complete
Ricicki, Patricia	Jun. 2012	complete
Sanford, Thomas	Apr. 2012	complete
Schwarz, Chad	separation	complete
Shah, David	Apr. 2012	complete
Shellhammer, Jay	separation	complete
Shen, Peter	Apr. 2012	to be completed by 09/16
Smith, Ashley	transfer	to be completed by 09/16
Steele, Joseph	separation	to be completed by 09/30
Storozuk, Thomas	separation	complete
Taveroni, Lauren	separation	to be completed by 09/16
Vallecillo, Cesar	separation	complete

IN RE: PELVIC MESH LITIGATION

Custodian	Custodial File Updated as of	Status of Production¹
Viana, Euzebio ("Zeb")	Jun. 2012	complete
Walji, Zenobia	transfer	complete
Warren, Jennifer	transfer	complete
Wess, Alyson	w/n last 6 mos.	to be completed by 09/16
Wilson, David	Apr. 2012	complete
Wingard, Michael	separation	complete
Wohlert, Stephen	separation	complete

IN RE: PELVIC MESH LITIGATION

**CUSTODIANS SCHEDULED FOR DEPOSITION
AFTER SEPTEMBER or NOT YET SCHEDULED**

Custodian	Custodial File Updated as of	Status of Production¹
Bagalio, Sheryl	separation	complete ²
Barbolt, Thomas	Separation	complete ³
Borkes, Gary	w/n last 6 mos.	complete
Cecchini, Peter	w/n last 6 mos.	complete
Chen, Meng	w/n last 6 mos.	to be completed by 09/16
DeLacroix, Bruno	N/A	newly-identified by plaintiffs
Gauld, Judi	Nov. 2012	complete
Guidry, Cyrus	Feb. 2013	complete
Harm, Michael	N/A	newly-identified by plaintiffs
Hinoul, Piet (depo continuation)	w/n last 6 mos.	to be completed by 10/15
Jacobs, Ed	Dec. 2011	complete
Kaminski, Marianne	separation	complete
Kammerer, Gene	separation	complete
Kirkemo, Aaron	separation	complete
Landgrebe, Susan	w/n last 6 mos.	to be completed by 09/16
McCabe, Barbara	w/n last 6 mos.	complete
Medina, Marjorie	w/n last 6 mos.	complete
Munchel, Kendra	separation	complete ²
Patire-Singer, Wanda	N/A	newly-identified by plaintiffs
Savidge, Sandy	w/n last 6 mos.	to be completed by 10/15
Schiaparel, Jill	separation	complete ²
Smith, Dan (depo continuation)	Nov. 2012	complete
Vazquez, Angel	w/n last 6 mos.	complete
Weisman, Harlan	separation	complete

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² No documents were identified.

³ Upon his separation, Mr. Barbolt left custodial documents with James Oldham, from whom they were collected.

CUSTODIANS SCHEDULED FOR DEPOSITION IN SEPTEMBER

Custodian	Custodial File Updated as of	Status of Production ¹
Angelini, Laura	w/n last 6 mos.	to be substantially completed on 9/16 ²
Arnaud, Axel (depo continuation)	Nov. 2012	complete
Brennan, Carolyn	Aug. 2013	to be completed on 9/16 ³
Brown, Allison London	separation	complete ⁴
Crosby, Cindy	w/n last 6 mos.	complete
Godwin, Amy	transfer	complete ⁴
Hart, James	w/n last 6 mos.	to be substantially completed on 9/16 ²
Hellhammer, Brigitte	separation	complete
Isenberg, Richard	separation	complete ⁴
Lamont, Dan (depo continuation)	Nov. 2012	complete
Robinson, Dave (depo continuation)	transfer	complete
Trzewik, Jurgen	w/n last 6 mos.	complete

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² Hard drives were not available for supplemental collection until recently. Responsive documents, if any from these hard drive supplementations are expected to be produced early to mid-October.

³ Ms. Brennan is presently updated and complete through June 2011. Her supplemental collection was conducted in August 2013, shortly after plaintiffs identified her as a deponent.

⁴ No documents were identified.